

Stephanie Kelleher  
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May 11, 2011

Reference: Scoping comments for the Pilot Joe EA

1. One of my primary issues/concerns is the **building of new roads**. Put simply, it is my opinion that the building of any new roads is problematic and to be avoided if at all possible. I am disappointed that BLM would again ignore the main issue with these timber sales/thinning projects/restoration projects. I know I speak for many who live here, who are directly impacted by BLM's insistence on building new roads. I feel that this same old direction has the possible impact of derailing this supposedly collaborative project. You have a lot of local participants in this project who are beginning to wonder if this is just the same old stuff in a new package. If this is the best you can offer with all this new road construction and picking the cream of the crop, what is the next (no so newsworthy) project going to propose?

In the event that a road such as the proposed ridge top road to access units 32-1 and 32-4A is deemed acceptable by the BLM then truly decommissioning that road after the sale would make that particular road acceptable to me. To leave that road open is to invite all the ills associated with roads such as dumping of trash, parties, spread of noxious weeds, OHV abuse, shooting, impacts to wildlife, etc. Decommissioning does not mean a gate or mound/tank trap. Ripping (not deep so as to reduce impacting the tree roots) and debris placement would be the minimum actions necessary to effectively close it for casual use.

The road proposed to access unit 27-1 is awful and just an example of how BLM did logging proposals in the past. This is the kind of unit that should not be treated until the economics make it practicable to use helicopters. I ask you to follow Franklin and Johnson's recommendation and withdraw this unit from consideration at this time.

Although I have not seen the road proposed for access to unit 34-2 (perhaps tomorrow) I suspect it is also unacceptable due to the steepness of the slope.

The road to access unit 31-4A runs through private land along and across a primary stream to BLM lands. Here BLM wants to extend a road on relatively flat land and thin the forest. Without some serious efforts to prevent it these actions will open up another area for OHV abuse and the associated new road ills. Additionally, how does BLM intend to deal with the travel in the riparian area? I can see a limited amount of use on the existing streamside road maybe acceptable as it appears fairly stable but loaded logging trucks maybe another story. Also repeated stream crossings with vehicles must be avoided. These issues should be balanced against the damage caused by a longer yard as proposed by Dr. Kellogg. Hopefully a smart decision will be made, again managing for the health of the forest first.

2. Initially I am excited about this “new” approach to thinning our forests. I also believe we need to save the biggest and healthiest trees of all species such as Franklin and Johnson are proposing but I have doubts as to whether their prescription can be implemented as planned. To retain a large spreading madrone tree for example without beating it up pretty badly will be very difficult given the amount of volume to be removed, the terrain and logistics. I seriously doubt a faller will be able to keep from damaging many of the leave trees. This stage of implementation is crucial to the success of this project.

3. **Monitoring** needs to be an integral part of this project from inception to years beyond. That information should be readily available to the public on your website and an effort should be made to inform those of us who are clearly interested as that information comes available. With monitoring comes the need to be willing to change as the circumstances dictate, always erring on the side of bio-diversity for the forest. This is particularly true in the actual implementation stage.

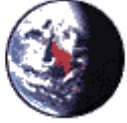
4. Yes it is right to save the big trees of all species but it is also important to leave some trees of all ages to retain and build biodiversity. Perhaps the “skips” will fill this niche. Too often treatments implemented by the BLM go to one extreme or the other. Examples of extremes would be the “slash buster orchard” on hills above China Gulch or the extensive removal of manzanita in fuels reduction projects. I ask you to think moderation in all aspects of this project.

In conclusion, I want to thank BLM for trying this innovative approach which I feel is a better way to do “thinning” than what has been offered in the past. We must continue to think of the forest as a multilayered system that thrives best on bio-diversity. I really appreciate the efforts to involve the public in this project. That is an example of the agency doing things different than the past. But I take exception with the proposed construction of new roads and hope BLM will recognize the real impacts of that path, socially and otherwise.

I withhold much of my judgment as to how successful this project will turn out until quite awhile after it is completed. Time will tell.

Thank you,

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05/13/2011 11:41 AM

To "Stephanie Kelleher" <skellehe@blm.gov>  
cc  
bcc  
Subject Pilot Joe Scoping - additional comment

Stephanie,

Please add the following to my Pilot Joe Scoping comments dated 5-11-11:

Yesterday I had the opportunity to view units on the western side of the proposed project which are accessed via Thompson Creek Road. I find that the 1080 feet of new road construction proposed to access unit 34-2 is an unacceptable place to put a road. This road extension is on as steep of ground as you will find in the Applegate

Valley. A road here will have a huge cutbank and most likely will require material added from elsewhere in order to get the road built and be stable. I feel a road on this steep rocky terrain is a long term mistake and should NEVER be built. Just because this type of road construction was a past practice does nothing to alleviate the environmental damage done every time one of these type of roads are constructed. All that money and damage to treat a paltry amount of forest (maybe 15 acres). This is a prime example of a unit that should be set aside until the economics are right to helicopter log it.

And not only will I be able to see the new road from my property but everyone who drives Hwy 238 from Ruch to Applegate will see it too. It probably won't be quite as visible as the road it would extend from located at the top of a 160 acre clear-cut on private industrial land. But that clear-cut stands out as a giant sore thumb in an otherwise beautiful landscape that is currently visually intact on the southern side of the Applegate River. BLM should not continue these types of poor forest practices used in the past. The pilot project should drop units 34-2 and 27-1 due to road and other issues.

Thank you.

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